

NATASHA C., a minor, individually,	:	IN THE UNITED STATES DISTRICT COURT
and by her father, GERALD C., and	:	FOR THE EASTERN DISTRICT OF
GERALD C., individually	:	PENNSYLVANIA
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	No. 03-1903
VISIONQUEST, LTD., VISIONQUEST	:	
NATIONAL, LTD., VISIONQUEST	:	
LODGE MAKERS, INC.,	:	
VISIONQUEST NONPROFIT	:	
CORPORATION, and DARRELL	:	
STEACH, an individual and in his official	:	JURY TRIAL DEMANDED
capacity as an employee of VisionQuest.	:	
	:	
Defendants.	:	

PLAINTIFFS' SUPPLEMENTAL PRETRIAL MEMORANDUM

PLAINTIFF'S TRIAL EXHIBITS:

- P1. Indiana County Court of Common Pleas Order dated September 25, 2000.
- P2. Purchase of Service Agreement between Indiana County Children & Youth Services and VisionQuest
- P3. VisionQuest employee records for Darrel Steach
- P4. VisionQuest employee records for Robbie Wilson
- P5-A through P5-TT VisionQuest Nightwatch Logs
- P6 VisionQuest Policies and Procedures
 - P6-A. VisionQuest Administrative Policies and Procedures Manual
 - P6-B. VisionQuest Human Resources Policies and Procedures Manual
 - P6-C. VisionQuest Residential Facilities Policies and Procedures
 - P6-D. VisionQuest Quality of Care Manual
- P7. VisionQuest Nightwatch Policy
- P8. VisionQuest Mission Statement

- P9. VisionQuest Employee Handbook
- P10. VisionQuest Investigation Files for Prior Incidents of Sexual Assault
 - P10-A. Records relating to Former Employee Robbie Wilson
 - P10-B. Records relating to Former Employee David Chandler
 - P10-C. Records relating to Former Employee Darian Gray
 - P10-D. Records relating to Former Employee Eric Robertson
 - P10-E. Records relating to Former Employee Kedrick Miles
- P11. Summaries of Sexual Assault incidents (prepared by VisionQuest)
- P12. Pennsylvania State Police Report, Incident No. H3-1194229
- P13. Guilty Plea Colloquy of Darrel Steach
- P14. Pennsylvania Dept. of Public Welfare Regulations – 55 Pa. Code §§3800.01, et seq.
- P15. VisionQuest Admission Documents for Natasha C.
- P16. VisionQuest Centering Plan for Natasha C.
- P17. VisionQuest Progress Reviews for Natasha C.
 - P17-A. Progress review dated November 2000
 - P17-B. Progress review dated December 2000
 - P17-C. Progress review dated February 2001
 - P17-D. Progress review dated March 2001
 - P17-E. Centering Progress Review dated May 2001
 - P17-F. Discharge Assessment
- P18. VisionQuest Psychological evaluations and reports concerning Natasha C.
- P19. VisionQuest Psychiatric evaluations and reports concerning Natasha C.
- P20. Report and Curriculum Vitae of Dr. Della Grossman
- P21. Report and Curriculum Vitae of Michael Nunno, DSW
- P22. Plaintiffs' Request for Admissions directed to Defendant Darrel Steach
- P23. VisionQuest Grievance Form dated 02/01/01 and submitted by Natasha C.
- P24. VisionQuest "Career Development Staffing Needs" dated 10/24/00

- P25. VisionQuest Education Records for Natasha C.
- P26. VisionQuest Consolidated Financial Statements Years ended June 30, 2001; June 30, 2002; and June 30, 2003.

HOLSINGER, CLARK & ARMSTRONG

By: /s/ Samuel H. Clark
Samuel H. Clark
832 Philadelphia Street
Indiana, PA 15701

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STEACH, an individual and in his official	:	JURY TRIAL DEMANDED
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	:	
Defendants.	:	

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of Plaintiffs' Supplemental Pretrial Memorandum was served upon Defendants Counsel identified below via facsimile on this the 4th day of July, 2004.

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/s/ Samuel H. Clark
Samuel H. Clark